

EXHIBIT F

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

MOOG INC.,

Plaintiff,

v.

SKYRYSE, INC., ROBERT ALIN PILKINGTON,
MISOOK KIM, and DOES NOS. 1-50,

Defendants.

Case No. 1:22-cv-00187

DEFENDANT MISOOK KIM'S
RESPONSES TO PLAINTIFF MOOG INC.'S FIRST SET OF
REQUESTS FOR ADMISSION

LOCKE LORD LLP
Joseph N. Froehlich
Brookfield Place,
200 Vesey Street, 20th Floor
New York, NY 10281-2101
212-415-8600

Mitchell J. Popham (admitted *pro hac vice*)
Rory S. Miller (admitted *pro hac vice*)
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300 S. Grand Ave., Suite 2600
Los Angeles, CA 90071
213-485-1500

*Attorneys for Defendants
Robert Alin Pilkington and Misook Kim*

Defendant Misook Kim (“Ms. Kim”) provides the following responses to the Requests for Admission, Set One, propounded by plaintiff Moog Inc. (“Plaintiff”), as follows:

PRELIMINARY STATEMENT

These responses are made solely for the purpose of this action. Each answer is subject to all objections as to competence, relevance, materiality, propriety and admissibility, and any and all other objections and grounds which would require the exclusion of any statement herein if the requests were asked of, or any statements contained herein were made by, a witness present and testifying in Court, all of which objections and grounds are reserved and may be interposed at the time of trial.

Except for explicit facts admitted herein, no incidental or implied admissions are intended hereby. The fact that Ms. Kim has answered any request should not be taken as an admission that Ms. Kim accepts or admits the existence of any facts set forth or assumed by such requests, or that such response constitutes admissible evidence. The fact that Ms. Kim has answered part or all of any request is not intended and shall not be construed to be a waiver by Ms. Kim of all or any part of any objection to any request made by Ms. Kim.

The Preliminary Statement is incorporated into each of the responses set forth below.

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1:

Admit that Kim retained possession of Moog Confidential Information upon beginning her employment at Skyrise.

RESPONSE TO REQUEST NO. 1:

Ms. Kim objects that the Request is vague and ambiguous as to the terms “retained possession” and “Moog Confidential Information.”

Subject to and without waiving the foregoing objection, Ms. Kim responds as follows: Ms. Kim admits that she had possession of some of Moog's information, documents, records, files and data that were non-public, proprietary and confidential, including Source Code, when she began her employment at Skyryse, Inc. ("Skyryse"). Except as expressly admitted, Ms. Kim denies the remainder of the Request.

REQUEST FOR ADMISSION NO. 2:

Admit that Pilkington retained possession of Moog Confidential Information upon beginning his employment at Skyryse.

RESPONSE TO REQUEST NO. 2:

Ms. Kim objects that the Request is vague and ambiguous as to the terms "retained possession" and "Moog Confidential Information."

Subject to and without waiving the foregoing objection, Ms. Kim responds as follows: Ms. Kim admits that Alin Pilkington had possession of some of Moog's information, documents, records, files and data that were non-public, proprietary and confidential, including Source Code,

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when Mr. Pilkington began his employment at Skyrise. Except as expressly admitted, Ms. Kim denies the remainder of the Request.

Dated: New York, New York
April 13, 2022

/s/ Joseph N. Froehlich

Joseph N. Froehlich
LOCKE LORD LLP
*Attorneys for Defendants Robert Alin Pilkington
and Misook Kim*
Brookfield Place, 200 Vesey Street
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Rory S. Miller (admitted *pro hac vice*)
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LOCKE LORD LLP
Attorneys for Defendants
300 S. Grand Ave., Suite 2600
Los Angeles, CA 90071
213-485-1500

VERIFICATION

U.S. DISTRICT COURT, WESTERN DISTRICT OF NEW YORK.

I have read the foregoing

**(1) DEFENDANT MISOOK KIM'S RESPONSES TO PLAINTIFF MOOG INC.'S
FIRST SET OF REQUESTS FOR ADMISSION; AND**

**(2) DEFENDANT MISOOK KIM'S RESPONSES TO PLAINTIFF MOOG INC.'S
FIRST SET OF REQUESTS FOR PRODUCTION**

and know their contents.

X CHECK APPLICABLE PARAGRAPH

☒ I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and to those matters I believe them to be true.

☐ I am ☐ an officer ☐ a partner ☐ _____, a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. ☐ I am informed and believe and on that ground allege that the matters stated in the foregoing documents are true. ☐ The matters stated in the foregoing documents are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

☐ I am one of the attorneys for _____, a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 12, 2022, at Torrance, California.


Misook Kim

PROOF OF SERVICE

Moog Inc. v Skyrise, Inc. et al.

U.S. District Court – Western District - Case No.: 1:22-cv-00187-LJV-JJM

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 300 South Grand Avenue, Suite 2600, Los Angeles, CA 90071.

On April 13, 2022, I served true copies of the following document(s) described as:

**DEFENDANT MISOOK KIM'S RESPONSES TO PLAINTIFF MOOG INC.'S FIRST
SET OF REQUESTS FOR ADMISSION**

on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on April 13, 2022, at Los Angeles, California.



Kristina M. Koch

SERVICE LIST

<p>Kazim A. Naqvi, Esq. Sheppard, Mullin, Richter & Hampton LLP 333 South Hope Street, 43rd Floor Los Angeles, CA 90071</p> <p>Tel: 310-228-3700 Email: knaqvi@sheppardmullin.com</p>	<p>Counsel for Plaintiff MOOG, INC.</p>
<p>Rena Andoh, Esq. Sheppard Mullin Richter & Hampton LLP 30 Rockefeller Plaza New York, NY 10112</p> <p>Tel: 212-653-8712 Fax: 212-653-8701 Email: randoh@sheppardmullin.com</p>	<p>Counsel for Plaintiff MOOG, INC.</p>
<p>Lai Yip, Esq. Sheppard Mullin Richter & Hampton, LLP 4 Embarcadero Center, 17th Floor San Francisco, CA 94111</p> <p>Tel: 415-434-9100 Fax: 415-434-3947 Email: LYip@sheppardmullin.com</p>	<p>Counsel for Plaintiff MOOG, INC.</p>
<p>Travis J. Anderson, Esq. Sheppard Mullin Richter & Hampton LLP 12275 El Camino Real, Suite 200 San Diego, CA 92130</p> <p>Tel: 858-720-8900 Fax: 858-509-3691 Email: tanderson@sheppardmullin.com</p>	<p>Counsel for Plaintiff MOOG, INC.</p>

<p>Robert J. Fluskey, Jr., Esq. Melissa Noel Subjeck, Esq. Pauline Thecla Muto, Esq. Hodgson Russ, LLP The Guaranty Building 140 Pearl Street, Suite 100 Buffalo, NY 14202</p> <p>Tel: 716.856.4000 Fax: 716-849-0349 Email: rfluskey@hodgsonruss.com msubjeck@hodgsonruss.com PMuto@hodgsonruss.com</p>	<p>Counsel for Plaintiff MOOG, INC.</p>
<p>Angelique Kaounis, Esq. Gibson Dunn & Crutcher LLP 2029 Century Park East, Suite 4000 Los Angeles, CA 90067</p> <p>Tel: 310-552-8546 Email: akaounis@gibsondunn.com</p>	<p>Attorneys for Defendant SKYRYSE, INC.</p>
<p>Ilissa Samplin, Esq. Gibson Dunn & Crutcher LLP 333 South Grand Avenue, Suite 4600 Los Angeles, CA 90071</p> <p>Tel: 213-229-7354 Email: isamplin@gibsondunn.com</p>	<p>Attorneys for Defendant SKYRYSE, INC.</p>
<p>Josh Krevitt, Esq. Katherine Dominguez, Esq. Michael M. Polka, Esq. Gibson, Dunn & Crutcher, LLP 200 Park Avenue New York, NY 10166-0193</p> <p>Tel: 212-351-2490 Fax: 212-351-6390 Email: jkrevitt@gibsondunn.com kdominguez@gibsondunn.com mpolka@gibsondunn.com</p>	<p>Attorneys for Defendant SKYRYSE, INC.</p>

<p>Justine M. Goeke, Esq. Gibson, Dunn & Crutcher, LLP Jamboree Center 4 Park Plaza Irvine, CA 92614</p> <p>Tel: 212-351-5372 Email: jgoeke@gibsondunn.com</p>	<p>Attorneys for Defendant SKYRYSE, INC.</p>
<p>Terrance P. Flynn, Esq. Harris Beach LLP Larkin at Exchange 726 Exchange Street, Suite 1000 Buffalo, NY 14210</p> <p>Tel: 716-200-5050 Fax: 716-200-5201 Email: tflynn@harrisbeach.com</p>	<p>Attorneys for Defendant SKYRYSE, INC.</p>

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

MOOG INC.,

Plaintiff,

v.

SKYRYSE, INC., ROBERT ALIN PILKINGTON,
MISOOK KIM, and DOES NOS. 1-50,

Defendants.

Case No. 1:22-cv-00187

DEFENDANT ROBERT ALIN PILKINGTON'S
RESPONSES TO PLAINTIFF MOOG INC.'S FIRST SET OF
REQUESTS FOR ADMISSION

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Rory S. Miller (admitted *pro hac vice*)
William C. Mullen (admitted *pro hac vice*)
300 S. Grand Ave., Suite 2600
Los Angeles, CA 90071
213-485-1500

*Attorneys for Defendants
Robert Alin Pilkington and Misook Kim*

Defendant Robert Alin Pilkington (“Mr. Pilkington”) provides the following responses to the Requests for Admission, Set One, propounded by plaintiff Moog Inc. (“Plaintiff”), as follows:

PRELIMINARY STATEMENT

These responses are made solely for the purpose of this action. Each answer is subject to all objections as to competence, relevance, materiality, propriety and admissibility, and any and all other objections and grounds which would require the exclusion of any statement herein if the requests were asked of, or any statements contained herein were made by, a witness present and testifying in Court, all of which objections and grounds are reserved and may be interposed at the time of trial.

Except for explicit facts admitted herein, no incidental or implied admissions are intended hereby. The fact that Mr. Pilkington has answered any request should not be taken as an admission that Mr. Pilkington accepts or admits the existence of any facts set forth or assumed by such requests, or that such response constitutes admissible evidence. The fact that Mr. Pilkington has answered part or all of any request is not intended and shall not be construed to be a waiver by Mr. Pilkington of all or any part of any objection to any request made by Mr. Pilkington.

The Preliminary Statement is incorporated into each of the responses set forth below.

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1:

Admit that Kim retained possession of Moog Confidential Information upon beginning her employment at Skyrise.

RESPONSE TO REQUEST NO. 1:

Mr. Pilkington objects that the Request is vague and ambiguous as to the terms “retained possession” and “Moog Confidential Information.”

Subject to and without waiving the foregoing objection, Mr. Pilkington responds as follows: A reasonable inquiry concerning the matter in the Request has been made, and the information known or readily obtainable at this time is insufficient to enable Mr. Pilkington to admit or deny the matter.

REQUEST FOR ADMISSION NO. 2:

Admit that Pilkington retained possession of Moog Confidential Information upon beginning his employment at Skyrise.

RESPONSE TO REQUEST NO. 2:

Mr. Pilkington objects that the Request is vague and ambiguous as to the terms “retained possession” and “Moog Confidential Information.”

Subject to and without waiving the foregoing objection, Mr. Pilkington responds as follows: Mr. Pilkington admits that he had possession of some of Moog’s information, documents, records, files and data that were non-public, proprietary and confidential, including

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Source Code, when he began his employment at Skyrise, Inc. (“Skyrise”). Except as expressly admitted, Mr. Pilkington denies the remainder of the Request.

Dated: New York, New York
April 13, 2022

/s/ Joseph N. Froehlich

Joseph N. Froehlich
LOCKE LORD LLP
*Attorneys for Defendants Robert Alin Pilkington
and Misook Kim*
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LOCKE LORD LLP
Attorneys for Defendants
300 S. Grand Ave., Suite 2600
Los Angeles, CA 90071
213-485-1500

VERIFICATION

U.S. DISTRICT COURT, WESTERN DISTRICT OF NEW YORK.

I have read the foregoing

(1) DEFENDANT ROBERT ALIN PILKINGTON'S RESPONSES TO PLAINTIFF MOOG INC.'S FIRST SET OF REQUESTS FOR ADMISSION; AND

(2) DEFENDANT ROBERT ALIN PILKINGTON'S RESPONSES TO PLAINTIFF MOOG INC.'S FIRST SET OF REQUESTS FOR PRODUCTION

and know their contents.

X CHECK APPLICABLE PARAGRAPH

☒ I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and to those matters I believe them to be true.

☐ I am ☐ an officer ☐ a partner ☐ _____, a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. ☐ I am informed and believe and on that ground allege that the matters stated in the foregoing documents are true. ☐ The matters stated in the foregoing documents are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

☐ I am one of the attorneys for _____, a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 12, 2022, at Torrance, California.



Robert Alin Pilkington

PROOF OF SERVICE

Moog Inc. v Skyrise, Inc. et al.

U.S. District Court – Western District - Case No.: 1:22-cv-00187-LJV-JJM

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 300 South Grand Avenue, Suite 2600, Los Angeles, CA 90071.

On April 13, 2022, I served true copies of the following document(s) described as:

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on April 13, 2022, at Los Angeles, California.



Kristina M. Koch

SERVICE LIST

<p>Kazim A. Naqvi, Esq. Sheppard, Mullin, Richter & Hampton LLP 333 South Hope Street, 43rd Floor Los Angeles, CA 90071</p> <p>Tel: 310-228-3700 Email: knaqvi@sheppardmullin.com</p>	<p>Counsel for Plaintiff MOOG, INC.</p>
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<p>Angelique Kaounis, Esq. Gibson Dunn & Crutcher LLP 2029 Century Park East, Suite 4000 Los Angeles, CA 90067</p> <p>Tel: 310-552-8546 Email: akaounis@gibsondunn.com</p>	<p>Attorneys for Defendant SKYRYSE, INC.</p>
<p>Ilissa Samplin, Esq. Gibson Dunn & Crutcher LLP 333 South Grand Avenue, Suite 4600 Los Angeles, CA 90071</p> <p>Tel: 213-229-7354 Email: isamplin@gibsondunn.com</p>	<p>Attorneys for Defendant SKYRYSE, INC.</p>
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<p>Justine M. Goeke, Esq. Gibson, Dunn & Crutcher, LLP Jamboree Center 4 Park Plaza Irvine, CA 92614</p> <p>Tel: 212-351-5372 Email: jgoeke@gibsondunn.com</p>	<p>Attorneys for Defendant SKYRYSE, INC.</p>
<p>Terrance P. Flynn, Esq. Harris Beach LLP Larkin at Exchange 726 Exchange Street, Suite 1000 Buffalo, NY 14210</p> <p>Tel: 716-200-5050 Fax: 716-200-5201 Email: tflynn@harrisbeach.com</p>	<p>Attorneys for Defendant SKYRYSE, INC.</p>